

# **EXHIBIT 11**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA**

**DEW ET AL. – PLAINTIFF FACT SHEET**

The person completing this Plaintiff Fact Sheet is under oath, subject to the penalties of perjury, and must provide information that is true and correct to the best of his or her knowledge. The person completing this Plaintiff Fact Sheet must answer every question to the best of his or her knowledge. If he/she cannot recall or does not know all the details requested, he/she must provide as much information as he/she can and indicate which information he/she cannot recall or does not know. He/she must supplement his/her responses if he/she learns that they are incomplete or incorrect.

If the person completing this Plaintiff Fact Sheet is the Plaintiff, then the questions relate to the Plaintiff and, as used herein, “you” refers to the Plaintiff. If this Plaintiff Fact Sheet is being filled out on behalf of someone who has died or is a minor, then the questions relate to the deceased person or minor asserting claims in the lawsuit and, as used herein, “you” refers to the decedent or minor. If this Plaintiff Fact Sheet is being filled out on behalf of someone who has died, then the questions should be answered as of the time immediately prior to his or her death unless a different time period is specified.

The Plaintiff Fact Sheet shall be completed in accordance with the requirements and guidelines set forth in the applicable Case Management Order.

**I. PLAINTIFF INFORMATION**

1. **Name:** Cynthia Marie Faircloth
2. **State any other name(s), including maiden names, that you have used and when:**  

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3. **Date of birth:** 1/15/1949
4. **Place of birth:** Fayetteville, NC
5. **Driver's License No:** 2240140      **State of Issuance:** NC  
**Status (Active/Revoked):** Active
6. **If Currently Married:**
  - a. **Spouse's Name:** n/a
  - b. **Spouse's date of birth:** \_\_\_\_\_ **c. Date of Marriage:** \_\_\_\_\_
  - d. **Spouse Occupation:** \_\_\_\_\_

**7. If the person completing this Fact Sheet is doing so in a representative capacity (on behalf of the estate of a deceased person or a minor), state:**

a. Representative's name and address: n/a \_\_\_\_\_

b. Representative's relationship to the deceased or the minor plaintiff: \_\_\_\_\_

c. Date of death (if applicable): \_\_\_\_\_

d. If the representative was appointed as representative by a court, identify the state, court term, and case number, and date of the appointment order (alternatively, you may attach a copy of your letters of office, in which case, please write "see attached"):

If the representative represents a decedent, please provide a copy of the decedent's death certificate.

**8. Please provide the following information or a recent resume/curriculum vitae that lists your employment history over the past five (5) years or 5 years before retirement, whichever period is longer:**

Employer/Company	Address	Occupation/ Job Title/ Job Description	Dates of Employment
Purolator	Fayetteville, NC	Forklift Operator	Approximately 1974-1999

**9. WITHOUT LIMITATION TO DATE RESTRICTIONS, please provide the following information for ANY employment you have had with DuPont or Chemours:**

Employer/Company	Address	Occupation/ Job Title/ Job Description	Dates of Employment	Reason for Departure
None				

**10. If in the past five (5) years, you have been a plaintiff in any lawsuit or have made any non-insurance claim (apart from the present lawsuit) relating to any alleged damage to the property at issue in this action or seeking recovery of other economic loss**

**damages, explain where and when the lawsuit or claim was filed or submitted, the nature of the damages claimed, the names of the adverse parties involved, and the outcome or disposition of the lawsuit or claim:**

None

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**11. Identify all email addresses, whether personal or associated with your employer or school that you have used during the past five (5) years.**

N/A

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**12. If you use any social media platforms (e.g., Facebook, Instagram, Twitter), state the social media platform and your handle or username associated with that platform for the past five (5) years.**

N/A

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**13. Identify whether you have regularly used for at least one year prior to filing your lawsuit, any of the following sources of drinking water since 1971 and list the dates you used each source:**

	<b>Ever Used (Y/N)?</b>	<b>When used/ Frequency of Use:</b>	<b>Where Obtained (address, if a residence; name and address of business, if a business)</b>	<b>Ways in Which You Used the Water (drinking, bathing, cooking, etc.)</b>
Municipal Water				
Private Well Water	Y	Daily; 2007-current	3884 Tranquility Rd.	All uses
Bottled Water	Y	Daily; approximately 2018-current	Chemours	Drinking, cooking
Water at Job				
Other (explain)				

**14.** If your residence is on a private well, has a Point of Entry Treatment (POET) system been installed? If so, state the date of installation, who installed it, and any results of testing for PFAS since the POET was installed.

N/A

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**15.** Besides a POET, has any property at which you claim to have been exposed to PFAS undergone any remediation for any contaminant or hazardous substance (not limited to PFOA)? If so, state the activity, the contaminant or hazardous substance of concern, the date of the activity, who performed the activity, and any results of testing for such contaminant or hazardous substance since the remediation was complete.

N/A

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**16.** If you have ever used a water filter (other than a POET system) at your home (the property at issue) for your drinking water, state the approximate dates used (if known), type (if known), manufacturer (if known), and who furnished/paid for the filter (if known):

n/a

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**17.** If you have ever participated in a bottled water replacement program, state the approximate dates you participated (if known), who sponsored/ran the program (if known), and who furnished/paid for the water you received from the program (if known):

Chemours; approximately 2018-current;

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## II. PROPERTY-RELATED QUESTIONS

**18.** Are you claiming property damages in this lawsuit:  Yes  No

If yes, for which property(ies); state the address(es) and assessor parcel number(s):

3884 Tranquility Rd., Fayetteville, NC 28306

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**FOR EACH SUCH PROPERTY, IDENTIFY THE FOLLOWING** (separate questionnaires should be completed for each property for which you are claiming property damage):

**19. ADDRESS:** 3884 Tranquility Rd., Fayetteville, NC 28306

**20. Do you own, lease or rent?**  OWN  LEASE  RENT  OTHER

**21. Identify the Type of Property (check all that apply):**

Single-Family Home

Multi-Family Home/Apartment Building

Townhouse

Condo

Co-Op

Office Building

Other (specify): \_\_\_\_\_

**22. Identify the Use of Property (check all that apply):**

Residential

Commercial

Agricultural

Vacant Land

Other (specify): \_\_\_\_\_

**23. Do you hold title to this property?  YES  NO**

I recently placed the deed in my daughter's and grandchildren's names.

**24. If you hold title to this property, how did you acquire the property:**

Purchase  Inheritance  Other (Specify): \_\_\_\_\_

25. If you purchased the property, state the date of purchase and purchase price:

2007 - \$50,000 (approximate) ; mobile home purchase was approximately \$10,000 in addition.

26. For the property at issue, identify any current or prior mortgage(s), refinancing(s), or home equity loan(s) that you and/or your spouse and/or your business holds or has held:

n/a  
\_\_\_\_\_  
\_\_\_\_\_

27. For the property at issue, have you and/or your spouse and/or your business applied for and been denied any mortgage, refinancing or home equity loan by any financial institution in the prior five (5) years?  Yes  No

If yes, please identify the name of the institution(s), the date(s) and the reason(s) provided (if any):  
\_\_\_\_\_  
\_\_\_\_\_

28. If you have occupied the property, state the dates of your occupancy:

2007-present  
\_\_\_\_\_

29. Identify each person who resided with you at the property, including the name and current address of the person, the person's date of birth, the dates the person resided at the property, and the reason the person no longer resides there:

n/a  
\_\_\_\_\_

30. If the property has ever been vacant for over sixty (60) days, state the period(s) of vacancy:

n/a  
\_\_\_\_\_

31. Identify the source of water at this property:  Private Well  Municipal Water

If a private well, please state the date the well was drilled or created, who drilled or created the well, and whether you have any government-issued permits related to the well:

Well was on property when I purchased it.

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If municipal water, please state the length of service with each water provider:

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**32. Are you claiming diminution in property value?  Yes  No**

**If yes, during which year(s)/period of time:** Plaintiff seeks to recover for the loss of property value realized during the time of Plaintiff's ownership of the subject property relating to PFAS contamination. This will be the subject of expert testimony.

**33. Are you claiming any other type(s) of property damage(s):  Yes  No**

If yes, please describe such alleged damage:

See Response to No. 46

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If yes, please describe the alleged damages sought or costs incurred:

See Response to No. 46

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**34. Describe any remediation, renovation, or other work done to counteract or prevent alleged property damage for the property at issue, including date, type of work, person or entity who did the work, and prices quoted and charged:**

n/a

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**35. Has there been any testing or sampling for GenX, PFOA, PFOS, or other per- and polyfluoroalkyl substances (PFAS) of the air, soil, or water (whether ground water, well water, or other drinking water) at or on the property?**

Yes  No

If yes, state the following for each test conducted or provide the testing reports and results:

Area Tested/Sampled (e.g., tap water in kitchen; air in basement)	Date of Test/Sample	Entity that Conducted Testing/Sampling	Results
See produced results.			

**36. Has there been any testing or sampling for other contaminants or chemicals (such as lead, arsenic, mercury, radon), of the air, soil, or water at or on the property since 1971 or your ownership of the property?**

Yes  No

If yes, state the following for each incidence of testing or sampling or provide the testing reports and results:

Chemical or Contaminant (e.g., mold, lead, radon)	Area Tested/Sampled (e.g., basement floor, soil in backyard, tap water in bathroom)	Date of Test/Sample	Entity that Conducted Testing/Sampling	Results

**37. Identify any underground oil tanks or septic systems on the property and whether they have undergone any repairs or remediation:**

Septic tank – no repairs/remediation

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**38. Identify any damage to the property incurred by result of flood, fire, wind, earthquake, mold, pest or accident:**

n/a

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**39. Identify any homeowners' insurance claim within the last five (5) years that you and/or your spouse has made, including the date(s), reason for the claim, insurance company, and result of the claim:**

n/a

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**40. Have you made any homeowners' insurance claim related to the presence of GenX, PFOA, PFOS, or other PFAS at or on your property?  Yes  No**

If yes, identify the date of the claim, the nature of the claim, and the result of the claim.

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**41. Identify and describe any disclosures that you and/or your spouse received at the time of purchase or occupancy concerning the presence of any contaminant in any structure, well, or other portion of the property.**

No

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**42. Describe each instance when the value of the property has been assessed or determined, including dates of any valuations, identification of who performed valuations, and the results of any valuations.**

Assessments for the purpose of calculating property taxes conducted by NC Tax Assessors.

**43. Have you made any attempt to sell the property in the last five (5) years?  Yes  No**

If yes, identify the date(s) on which you offered or listed the property for sale, the listing price(s) or any other price at which you were willing to sell, any offer of purchase that was received, and the name, address and telephone number of any realtor that was engaged to assist with the sale of the property:

No

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**44. Please identify all persons who you believe possess information concerning your alleged property damage. For each person, please state their name, address, phone number, relationship to you, and the information you believe they possess.**

Keresea Cox; 3556 Belridge Dr, Fayetteville, NC 28306; daughter; information about the contamination, property damage, and associated loss of use and enjoyment of our property.

Christopher Noah Cox; 3556 Belridge Dr, Fayetteville, NC 28306; grandson; information about the contamination, property damage, and associated loss of use and enjoyment of our property.

Michael David Cox III; 3556 Belridge Dr, Fayetteville, NC 28306; grandson; information about the contamination, property damage, and associated loss of use and enjoyment of our property.

**45. Please describe by category the documents that you may use to support your claims in this lawsuit.**

Testing results; communications to and from the State; documents developed by the State; communications to and from Defendants and/or its agents; documents developed by Defendants and/or its agents; documents evidencing, reflecting, or supporting Plaintiff's

claim for damages; documents relating to the extent or nature of PFAS contamination originating from the Fayetteville Works facility; documents evidencing the source of PFASs detected in, on, and/or around Plaintiff's property; documents produced by parties, and third parties, during the discovery period of this litigation; documents relating to the investigation of treatment technologies to remove PFAS chemicals from drinking water; publicly available documents contained in the files of the EPA, Agency for Toxic Substances and Disease Registry (ATSDR), North Carolina Department of Environmental Quality, North Carolina Department of Health and Human Services, North Carolina Department of Justice, relating to (i) studies of the environmental and health effects of PFAS chemicals; (ii) the presence of PFAS chemicals in the soil, air, groundwater and surface water; (iii) releases, emissions and/or discharges of PFAS chemicals from Defendants' Fayetteville Works facility; (iv) permits relating to Defendants' Fayetteville Works facility; and/or (v) investigations and enforcement actions relating to Defendants and PFAS chemicals.

**46. Which of the following categories of property damages are you claiming in this lawsuit?**

The full nature and extent of Plaintiff's damages have not yet been determined and will be the subject of expert opinion and testimony.

Cost of filtering water

Description: Capital, operating, and maintenance costs for a whole home point of entry treatment system for the removal of all PFAS contaminants.

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Estimated Value: To be determined

Cost of obtaining alternative water source

Description: To be determined

Estimated Value: To be determined

Cost of cleaning and/or replacing plumbing, fixtures, appliances

Description: To be determined

Estimated Value: To be determined

Cost of testing for potential contamination

Description: All costs to monitor and test for the presence of PFAS in soil, air, and/or water (which includes but is not limited to surface water, groundwater, and water for domestic use) at Plaintiff's property.

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Estimated Value: To be determined

Loss of use and enjoyment of property

Description: Plaintiff is unable to fully and safely use and enjoy Plaintiff's property.

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Estimated Value: To be determined

Reduced property value

Description: To be determined

Estimated Value: To be determined

Reduced business value

Description: \_\_\_\_\_

Estimated Value: \_\_\_\_\_

Other (specify): Encumbrance due to filtration system

Description: Plaintiff seeks to recover for the encumbrance to Plaintiff's property due to the presence of a filtration system.

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Estimated Value: To be determined

**47. Aside from property damage, are you making any other claims against Defendants in this lawsuit?  Yes  No**

If yes, please state the category of additional losses you allege, then for each claimed category, briefly describe the nature and estimate the value of these additional claim(s):

Plaintiff is not making a claim for personal injury. Plaintiff is seeking compensatory and punitive damages as outlined in Plaintiff's Complaint for all PFAS related damages to Plaintiff's property.

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### **LOSS OF USE AND ENJOYMENT**

- I am concerned about the health of myself, my family, and my animals. This concern is ongoing, because I still have to bathe in the contaminated water and wash my clothes in the contaminated water.
- Transporting, storing, using, and disposing of the bottled water has been inconvenient and burdensome.
- I had a garden on my property but no longer do because of the contamination.
- Not being able to use water in my house has been inconvenient and burdensome.
- I used to eat venison from deer on my property, but now I cannot.

## RECORDS

Provide the following documents that are in your possession:

- (1) the results for any tests, including but not limited to the compounds, chemicals, and contaminants listed in Question Numbers 35 and 36 above, at or on your property (e.g., of water, air, or soil);
- (2) if you are alleging damage to real property, provide the following:
  - (a) the deed for such property or, if the deed is not in your possession, other evidence of property ownership in your possession;
  - (b) any appraisals of such property in your possession;
  - (c) the declarations page of any homeowners' insurance policy for which Plaintiff has made a claim regarding the alleged presence of GenX, PFOA, PFOS, or other PFAS;
  - (d) any documents reflecting offers of purchase since January 1, 2015.

## VERIFICATION

I declare under penalty of perjury subject to all applicable laws, that I have carefully reviewed the final copy of this Plaintiff Fact Sheet and verified that all of the information provided is true and correct to the best of my knowledge, information and belief.

Cynthia Marie Faricloth  
Signature of Plaintiff

Cynthia Marie Faricloth  
Print Name

MAY 6<sup>th</sup> 2020  
Date